LAW OFFICES

GULLETT, SANFORD, ROBINSON & MARTIN, PLLC

230 FOURTH AVENUE, NORTH, 3RD FLOOR Post Office Box 198888 NASHVILLE, TENNESSEE 37219-8888

> TELEPHONE (615) 244-4994 FACSIMILE (615) 256-6339

GARETH S. ADEN G. RHEA BUCY A. SCOTT DERRICK M. TAYLOR HARRIS, UR. LINDA W. KNIGHT JOEL M. LEEMAN ALLEN D. LENTZ JOSEPH MARTIN, JR. JUSTIN T. MILAM JEFFREY MOBLEY JULIE C. MURPHY

KATHRYN H. PENNINGTON WM. ROBERT'POPE, JR. GEORGE V. CRAWFORD, JR. WAYNE L. ROBBINS, JR. JACK W. ROBINSON, JR. A. SCOTT DERRICK JACK W. ROBINSON, JR. THOMAS H. FORRESTER JACK W. ROBINSON, SR. -VALERIUS-SANFORD WESLEY D. TURNER JOHN D. LENTZ OF COUNSEL

1905-1992

September 2, 1997

Mr. David Waddell **Executive Secretary** Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37201

> Re: Universal Service Generic Contested Case

> > Docket No. 97-00888

Dear Mr. Waddell:

Enclosed for filing are the original and thirteen copies of Reply Comments of AT&T Communications of the South Central States, Inc. in response to the Hearing Officer's Notice of Proposed Schedule and Request for Comments.

Copies are being served on counsel for known parties and also to other interested parties.

Yours very truly,

VS/ghc Enclosure BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In re:

UNIVERSAL SERVICE GENERIC CONTESTED CASE 7 057 2 677 10 18

Docket No: 97-00888

REPLY COMMENTS OF AT&T COMMUNICATIONS
OF THE SOUTH CENTRAL STATES, INC.

AT&T Communications of the South Central States, Inc. (here "AT&T") has reviewed the various comments filed in response to the Hearing Officer's Notice of Proposed Schedule and Request for Comments. AT&T observes that there are some areas of substantial agreement, e.g., that the cost studies which the TRA has agreed to undertake must be completed prior to February 6, 1998, and for that reason the schedule proposed by the staff should be revised. AT&T also observes that there are various areas of substantial disagreement. However, AT&T believes that no useful purpose would be served at this time by filing further voluminous

comments replying to each comment made by each of the other parties.

Instead of further comments, AT&T suggests that the focus at this time should be; first, on seeking a consensus as to what issues the TRA needs to address at the outset of this proceeding, including issues that must be addressed in time for a decision by February 6, 1998; second, on a schedule which will allow for adequate opportunity to address those issues; third, on what issues may be addressed after February 6, 1998; and, fourth, on a tentative schedule for addressing those issues. Discussions among the parties may facilitate at least the narrowing of the decisions which need to be made.

Val Sapford, #3316

GULLETT, SANFORD, ROBINSON & MARTIN, PLLC

230 Fourth Avenue North, 3rd Floor

P.O. Box 198888

Nashville, TN 37219-8888

(615) 244-4994

James P. Lamoureux, Esq.

AT&T

Room 4068

1200 Peachtree Street N.E.

Atlanta, GA 30309

(404) 810-4196

Attorneys for AT&T Communications of the South Central States, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Reply Comments of AT&T Communications of the South Central States, Inc. has been served on counsel of record and other interested parties via First Class Mail postage prepaid, this **2nd** day of **September**, **1997**.

Val Sanford

Guy M. Hicks, Esq. Attorney for BellSouth 333 Commerce Street, Suite 2101 Nashville, Tennessee 37201-3300

H. Ladon Baltimore, Esq.
Attorney for LCI International Telecom
Farrar & Bates, L.L.P.
211 Seventh Avenue North
Suite 320
Nashville, TN 37219-1823

Jon Hastings, Esq.
Attorney for MCI
Boult Cummings, Conners & Berry
P. O. Box 198062
Nashville, Tennessee 37219

T. G. Pappas, Esq. Coalition of Small LEC Bass, Berry & Sims 2700 First American Center 313 Deaderick Street Nashville, TN 37238-2700

Carolyn Tatum Roddy, Esq. Attorney for Sprint Sprint Communications Co., L.P. 3100 Cumberland Circle - N0802 Atlanta, Georgia 30339

Dana Shaffer, Esq.
Attorney for NEXTLINK
105 Molloy Street, Suite 300
Nashville, Tennessee 37201

Richard M. Tettlebaum, Esq. Citizens Telecom Suite 500 1400 16th Street, N.W. Washington, DC 20036 Henry Walker, Esq.
Attorney for American Communications
Services, Inc.
Boult, Cummings, Conners & Berry
P. O. Box 198062
Nashville, Tennessee 37219

Charles B. Welch, Jr., Esq. Attorney for Time Warner, Inc. Farris, Mathews, Gilman,, Branan & Hellen 511 Union Street, Suite 2400 Nashville, TN 37219

L. Vincent Williams, Esq. Office of the Consumer Advocate Cordell Hull Building, 2nd Floor 426 Fifth Avenue North Nashville, Tennessee 37243-0500

James B. Wright, Esq.
United Telephone-Southeast, Inc. & Sprint
Communications
14111 Capital Boulevard
Wake Forest, NC 27587-5900

Dana Frix, Esq. AVR, L.P. d/b/a Hyperion of TN, L.P. Swidler & Berlin, Chartered 3000 K Street, N.W., Ste 300 Washington, D.C. 20007

Guilford F. Thornton, Jr., Esq. BellSouth Cellular Corp. Stokes & Bartholomew 424 Church Street, 28th Floor Nashville, TN 37219-2386

James W. Dempster, Esq. Ben Lomand Rural Telephone Cooperative, Inc. 118 East Main Street P. O. Box 332 McMinnville, TN 37111-0332 Wayne Gassaway, Manager DeKalb Telephone Cooperative, Inc. P. O. Box 247 Alexandria, TN 37012

William C. Carriger, Esq. Electric Power Board of Chattanooga 400 Krystal Building One Union Square Chattanooga, TN 37402

Dan H. Elrod, Esq. and Kenneth M. Bryant, Esq. GTE Mobil Net Trabue, Sturdivant & DeWitt 511 Union Street, 25th Floor Nashville, TN 37219

Fred L. Terry, General Manager Highland Telephone Cooperative, Inc. P. O. Box 119 Sunbright, TN 37872

F. Thomas Rowland, Manager North Central Telephone Cooperative, Inc. P. O. Box 70 Lafayette, TN 37083

D. Billye Sanders, Esq.
TCG MidSouth, Inc.
Waller, Lansden, Dortch & Davis
511 Union Street, Suite 2100
P. O. Box 198966
Nashville, TN 37219-8966

Glen G. Sears, General Manager West Kentucky Rural Telephone Cooperative Corp, Inc. 237 North 8th Street Mayfield, KY 42066

W. T. Sims, Manager Yorkville Telephone Cooperative P. O. Box 8 Yorkville, TN 38389 Charlene Taylor (Chaz Taylor, Inc.) ATTN: Sheila Davis 3401 West End Avenue, Suite 378 Nashville, TN 37203

Phoenix Network ATTN: Denise Newman 1687 Cole Boulevard Golden, Colorado 80401

Standard Communications Co. ATTN: Richard S. Smith, President 302 Sunset Drive, Suite 101 Johnson City, TN 37604

State Department of Education ATTN: Jane Walters Commissioner 6th Floor, Gateway Plaza 710 James Robertson Parkway Nashville, TN 37243-0375

State Department of Finance and Administration
ATTN: Jack R. McFadden
Director
598 James Robertson Parkway
Nashville, TN 37243-0560

360° Communications Company ATTN: Thomas J. Curran Director External Affairs 8725 W. Higgins Road Chicago, IL 60631

WorldCom
LaDon Baltimore, Esq.
Farrar & Bates, L.L.P.
211 Seventh Avenue, North, Suite 320
Nashville, TN 37219-1823